

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ARIEL E. BELEN, as Temporary Co-Trustee of the Trust created by Harold Herman dated March 1, 1990 and as Temporary Trustee of the Trust created by Rosemarie Herman dated November 27, 1991, and ROSEMARIE HERMAN, as Co-Trustee of the Trust created by Harold Herman dated March 1, 1990,

Plaintiffs,

-against-

JULIAN M. HERMAN, ROCLA, LLC, ROCLAB, LLC, THE VANGUARD GROUP, INC., OAKWORTH CAPITAL BANK, DENTONS SIROTE, PC and HOWARD NEISWENDER,

Defendants.

Case No. 22-cv-6455
(AKH)

**NOTICE OF MOTION
FOR LEAVE TO FILE
DOCUMENTS UNDER
SEAL**

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PLEASE TAKE NOTICE that upon the declaration in connection with motion to seal of Gayle S. Gerson, Esq., dated May 20, 2025, and upon all prior pleadings in this case, plaintiffs Hon. Ariel E. Belen (Ret.), as Temporary Co-Trustee of the Trust created by Harold Herman dated March 1, 1990 and as Temporary Trustee of the Trust created by Rosemarie Herman dated November 27, 1991, and Rosemarie Herman, as Co-Trustee of the Trust created by Harold Herman dated March 1, 1990 (collectively, the “Plaintiffs” or “Trustees”) will move before the Honorable Alvin K. Hellerstein, at the United States District Courthouse located at 500 Pearl Street, New York, New York 10601, at a date and time to be determined by the Court, for an order granting leave to file a document under seal, which is annexed to Plaintiffs’ Reply in Further Support of Motion to Compel Vanguard and Oakworth to Produce Documents Improperly Withheld Based on Assertion of Statutory Privilege. [ECF Doc. No. 181-182]

PLEASE TAKE FURTHER NOTICE that answering papers, if any, shall be served within the time provided for in Fed. R. Civ. P. 6 and Local Rule 6.1 of the Southern District of New York.

Dated: Garden City, New York
May 20, 2025

JASPMAN SCHESINGER NARENDRAN LLP
Attorneys for Plaintiffs

By: /s/Gayle S. Gerson
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